

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LINDA SHORT, OLIVIA PARKER,
ELIZABETH SNIDER, JENNIFER
DIPARDO, ANTHONY DIPARDO, SEANE
RONFELDT and JAMES TWIGGER, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

HYUNDAI MOTOR AMERICA, INC.,
HYUNDAI MOTOR COMPANY, KIA
MOTORS AMERICA, INC., and KIA
MOTORS CORPORATION,

Defendants.

No. 2:19-cv-00318-JLR

ORDER GOVERNING THE PROTOCOL
FOR PRODUCTION OF
ELECTRONICALLY STORED
INFORMATION AND DOCUMENTS

This Order Governing the Protocol for Production of Electronically Stored Information and Documents (“Protocol”) sets forth the specifications that shall govern document production during discovery in the above-captioned action.

I. GENERAL SCOPE AND PARAMETERS

A. Except as specifically limited herein, this Protocol governs the collection and production of discoverable electronically-stored information, documents, and any other data to be produced electronically in this Action.

1 B. The parties shall take reasonable steps to comply with the procedures set forth in
2 this Protocol.

3 C. The production of documents shall be conducted to maximize efficient and quick
4 access to documents and minimize related discovery costs.

5 D. Nothing herein shall alter the parties' respective responsibility to comply with the
6 applicable Federal Rules of Civil Procedure and any applicable Local Rules regarding the
7 collection or production of data. To the extent additional obligations or rights not addressed in
8 this Protocol arise under the Federal Rules of Civil Procedure or other applicable law or rules,
9 that law or rule shall govern. This Protocol shall neither enlarge, reduce, nor otherwise affect the
10 scope of discovery in this litigation as imposed by the Court's orders nor imply that discovery
11 produced under the terms of this Protocol is properly discoverable, relevant, or admissible in the
12 Action or in any other litigation. Specifically, if there is a conflict between the provisions of this
13 Protocol and any Order governing discovery in the Action, including but not limited to any
14 applicable case management or the Protective Order, the provisions of those Orders shall control.
15

16 E. Subject to (i) this Protocol, (ii) the parties' objections and responses to requests
17 for production of documents and interrogatories, and (iii) the operative Protective Order
18 including any subsequent amendments (collectively the "Protective Order"), all documents that
19 are responsive to discovery requests and not withheld based upon an assertion of any applicable
20 privilege or protection shall be produced in the manner provided herein. As set forth in Section
21 IX below, nothing in this Protocol shall be deemed to waive or limit any party's right to object to
22 production, discoverability, or confidentiality of data or any other discoverable materials.
23

24 F. The parties agree to promptly alert all other parties concerning any technical
25 problems associated with complying with this Protocol. To the extent compliance with this
26

1 Protocol imposes an undue burden with respect to any protocol, source, or search term listed
2 herein, the parties shall promptly confer in an effort to resolve the issue.

3 G. Consistent with their obligations under applicable Federal Rules of Civil
4 Procedure and the Local Rules, the parties will attempt to resolve, in person, in writing
5 (including email), or by telephone, disputes regarding the issues set forth herein prior to filing a
6 motion with the Court, or otherwise seeking relief. If the parties are unable to resolve the dispute
7 after a good faith effort, the parties may seek Court intervention in accordance with the Court's
8 procedures.
9

10 **II. PRODUCTION FORMATS**

11 **A. ESI**

12 With the exception of documents identified below (in Subsections II.A.1-3), ESI should
13 be produced as single-page, 1-Bit Group IV, 300 DPI TIFF images.
14

15 All ESI should be produced with a delimited, database load file that contains the
16 metadata fields listed in Table 1 hereto, to the extent captured at the time of the collection. To
17 the extent that metadata does not exist or is not reasonably accessible or available because it was
18 overwritten for any documents produced, nothing in this Protocol shall require any party to
19 extract, capture, collect, or produce such data. An .opt image cross-reference file should also be
20 provided for all TIFF images. The file's extracted text shall also be produced, and OCR shall
21 only be provided when a file requires redaction.
22

23 TIFF images should show any and all text and images which would be visible to the
24 reader using the native software that created the document. For example, TIFF images of email
25 messages should include the BCC line. All other documents or data must be processed to show
26 readily available hidden content, tracked changes or edits, comments, notes, and other similar

1 information for TIFF/JPG images, or alternatively such content must be viewable in the Native
2 File.

3 Documents containing track changes in different color(s) in the native format will be
4 produced as single-page, 300 DPI JPG images with JPG compression and a high-quality setting
5 as not to degrade the original image. All other originals may be produced in black and white
6 TIFF format, provided that: (1) a party may subsequently request, by Bates Number(s), a
7 replacement set of images in color, and (2) the producing party must provide such color versions
8 within five (5) business days.
9

10 **1. Spreadsheets**

11 The parties agree to produce Excel™ spreadsheets and other similar spreadsheet type
12 files in Native Format, with the exception that any spreadsheet that requires redaction may be
13 produced as a TIFF image, consistent with the format set forth in Section II.A above or with
14 native redactions. If a party chooses to produce spreadsheets with native redactions, it will
15 identify the documents subject to native redaction with its production. If any receiving party has
16 concerns about the documents produced with imaged or native redactions, they may request a
17 meet-and-confer to discuss the process used to perform those native redactions and the parties
18 will use reasonable best efforts to resolve any concerns regarding the redaction format. Any
19 spreadsheet that is produced in Native Format must have a corresponding placeholder TIFF
20 image bearing the language “Native File Provided,” indicating its place in the production (*i.e.*,
21 Bates stamped) and/or its relationship to other documents in the production. The Native File’s
22 extracted text shall also be produced, and OCR shall only be provided when a file requires
23 redaction.
24
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1 If a Native File is used at a deposition or hearing, or attached to a motion or other filing,
2 it shall be accompanied by its production number-stamped placeholder TIFF image to facilitate
3 tracking and authentication thereof.

4 To the extent that printouts or images of all or part of a spreadsheet were also maintained
5 in static form (*e.g.*, as a PDF or a hard-copy document), those documents will be produced as
6 static images consistent with the specifications for hard-copy documents.
7

8 **2. Presentation Slides**

9 The parties agree to produce Microsoft PowerPoint™ slides and other similar
10 presentation type files in Native Format (with the exception that any presentation slides that
11 require redaction will be produced in TIFF format only) or as a TIFF image, consistent with the
12 format set forth in Section II.A above. Any presentation slides that are produced in Native
13 Format must have a corresponding placeholder TIFF image bearing the language “Native File
14 Provided”, indicating its place in the production and/or its relationship to other documents in the
15 production. The Native File’s extracted text shall also be provided, and OCR shall only be
16 produced when a file requires redaction. Any presentation slides that are produced solely as
17 TIFF images should be processed with hidden slides and all speaker notes unhidden and should
18 be processed to show both the slide and the speaker’s notes.
19

20 If a Native File is used at a deposition or hearing, or attached to a motion or other filing,
21 it shall be accompanied by its production number-stamped placeholder TIFF image to facilitate
22 tracking and authentication thereof.
23

24 To the extent that printouts or images of all or part of a presentation slides were also
25 maintained in static form (*e.g.*, as a PDF or a hard-copy document), those documents will be
26 produced as static images consistent with the specifications for hard-copy documents.

1 **3. Miscellaneous Electronic Files**

2 Certain types of files including but not limited to system, program, proprietary files,
3 audio files, and video files may not be amenable to conversion into anything meaningful or
4 reviewable in TIFF format or other format reviewable within Relativity or a similar review
5 platform.

6 System, program, or proprietary files, to the extent they are subject to production, will not
7 be converted into TIFF format and instead will be produced in the form of a placeholder TIFF
8 image. The receiving party can request that these files be produced in Native Format, and the
9 parties shall meet and confer regarding production of the files. If the parties are unable to reach
10 agreement, the parties may present the dispute for judicial resolution regarding the form, if any,
11 of production.
12

13 If a Native File is used at a deposition or hearing, or attached to a motion or other filing,
14 it shall be accompanied by its production number-stamped placeholder TIFF image to facilitate
15 tracking and authentication thereof.
16

17 Audio, video, or other multimedia audio/visual files such as voice and video recordings
18 that are not system, program, or proprietary files (*e.g.*, .wav, .mpeg, and .avi), and that are not
19 reviewable in TIFF format, to the extent they are subject to production and are reviewable
20 without disproportionate burden, shall be produced in Native Format with a corresponding
21 placeholder TIFF image bearing the language “Native File Provided, indicating its place in the
22 production and/or its relationship to other documents in the production. No extracted or OCR
23 text shall also be provided for these natively produced files.
24

25 **B. Hard Copy Documents**

26 Hard copy documents should be scanned in a manner so as to retain the original
organization of the hard copy documents. Hard copy documents should be scanned as single-

1 page, 1-Bit Group IV, 300 DPI TIFF images with an .opt image cross-reference file and a
2 delimited database load file (*i.e.*, .dat). The database load file should contain the fields outlined
3 in Table 1. Hard-copy documents should be physically unitized. Hard-copy documents will be
4 produced in black and white TIFF format, provided that: (1) a party may subsequently request,
5 by Bates Number(s), a replacement set of images in color, and (2) the producing party must
6 provide such color versions within five (5) business days.

7
8 If a producing party reasonably believes that production of hard-copy documents is
9 unduly burdensome, the producing party shall seek to meet and confer in good faith with the
10 requesting party regarding content, volume, and related issues before any production of hard-
11 copy documents. If the parties are unable to reach agreement, the parties may present the dispute
12 for judicial resolution.

13 **C. Structured Data**

14
15 The producing party may opt to produce relevant and responsive information from
16 databases by querying the database for discoverable information and generating a report in a
17 reasonably usable and exportable electronic format (*e.g.*, in Microsoft Excel™ or .csv format).
18 The parties will meet and confer to discuss the most appropriate data extraction and cost-
19 effective production format for specific information contained in particular databases.

20 **III. PRODUCTION EXCHANGE**

21
22 Documents shall be exchanged on DVD-ROMs, CD-ROMs, USB drives, portable hard
23 drives, or through secure file transfer protocols (*e.g.*, FTP) or similar secure electronic
24 transmission. The production media shall be labeled with the Volume Number along with the
25 Bates Number range(s) of the materials. Where it is not practicable to do so, this information
26 may be provided in an accompanying letter or email. If a producing party encrypts or “locks”

1 the production, the producing party shall send, under separate cover or email, an explanation of
2 how to decrypt the files.

3 **IV. PROCESSING SPECIFICATIONS**

4 **A. De-duplication**

5 Removal of duplicate documents should only be done on exact duplicate documents
6 (based on MD5 or SHA-1 hash values, at the family level).
7

8 Attachments should not be eliminated as duplicates for purposes of production, unless the
9 parent email and all attachments are also duplicates. An email that includes content in the BCC
10 or other blind copy field should not be treated as a duplicate of an email that does not include
11 content in those fields, even if all remaining content in the email is identical. Custodian-specific
12 de-duplication may be applied to email files prior to upload to the review platform. Any other
13 de-duplication should be done across the entire collection (*i.e.*, global level) and the “All
14 Custodian” field should list each custodian, separated by a semicolon, who was a source of that
15 document. The “Custodian” field shall represent the custodian of the document uploaded to the
16 review platform.
17

18 **B. Email Thread Suppression**

19 Each party may also de-duplicate emails in such a way as to eliminate earlier or
20 incomplete chains of emails and produce only the most complete iteration of an email chain and
21 any unique attachments associated with the email set, provided that none of the earlier emails in
22 the chain contained attachments and the email chain does not exclude any email conversations
23 that split off from the primary thread. In other words, regardless of the existence of a more
24 complete, later email, all emails that contain attachments must also be produced and all unique
25 email chains should be produced.
26

1 **C. Corrupted or Unreadable Files**

2 If any file is corrupted or not readable by the producing party, and is attached to an
3 otherwise responsive document, it shall be produced with a slip sheet indicating the file is
4 corrupt and could not be reviewed.

5 **D. System Files**

6 Each party may exclude certain files and folders that are reasonably identified as system
7 files and do not contain user-created files.

8 **E. Other Deduplication Methods**

9 Use of these technologies to reduce the reviewable collection or production, other than as
10 described within this Protocol, requires the producing party to meet-and-confer with the
11 requesting party.
12

13 **F. Bates Numbering**

14 All images must be assigned a unique and sequential Bates Number.
15

16 **G. Parent-Child Relationships**

17 Responsive non-privileged electronic documents attached to an e-mail or embedded
18 within an electronic document not produced in its native form are to be produced sequentially
19 immediately after the parent document to preserve the parent-child relationship between
20 attachments, enclosures, embedded files, and/or exhibits to any parent document. The child-
21 document should be consecutively produced immediately after the parent-document. If a parent
22 or child is omitted from production as privileged or otherwise, the producing party shall produce
23 in place of the document a single-TIFF placeholder image indicating the withholding of the
24 document and the reason for the withholding.
25
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1 **H. Track Changes and Comments**

2 To the extent that a document contains tracked changes or comments, those tracked
3 changes and comments should be preserved when images of the document are created.

4 **I. Password Protected Files**

5 For password-protected files, the parties will make reasonable efforts to remove the
6 password or other security protection from any document prior to production or else produce the
7 password, if reasonably available. If the security protection cannot be removed from a document
8 after reasonable efforts by the producing party and the password is not reasonably available, the
9 producing party shall produce in place of the document a single-TIFF placeholder image.

10 **J. Embedded Documents**

11 Embedded files, except for images embedded in emails, are to be produced as family
12 groups or produced in their native form, such that embedded files are accessible for review.
13 Embedded files produced as images should be assigned Bates numbers that directly follow the
14 Bates numbers on the documents within which they are embedded.
15
16

17 **V. IDENTIFICATION AND COLLECTION OF DOCUMENTS**

18 The parties agree to meet and confer and use their reasonable best efforts to reach
19 agreement regarding custodians; search methodology to be applied, including, but not limited to,
20 search terms and date restrictions; and location of relevant data sources including custodial and
21 non-custodial sources.
22

23 Documents or categories of documents that are easily identifiable and segregable should
24 be promptly collected and produced without the use of search terms. The parties will indicate
25 which categories of documents will be produced with and without the use of search terms.
26 Where potentially responsive ESI shall be searched using search terms, the parties agree to
follow the process identified below and meet and confer regarding any proposed deviation.

1 Agreement on a search methodology does not relieve a party of its obligation under the Federal
2 Rules of Civil Procedure to conduct a reasonable search and produce all relevant and responsive
3 documents of which a party is aware. The discovery requests shall govern the scope of
4 documents to be produced, subject to any agreements reached during the parties' conferral, and
5 search terms do not supplant discovery requests.
6

7 With the objective of limiting the scope of review and production, and thereby reducing
8 discovery burdens, the parties agree that they will cooperate in good faith regarding the
9 identification, disclosure and formulation of appropriate search terms, document custodians, date
10 ranges, custodial and noncustodial sources of relevant ESI, and categories of potentially
11 responsive ESI in advance of any ESI search or production.
12

13 **A. Identification of Custodians**

14 The parties will meet and confer within 45 days of the entry of this Protocol regarding the
15 appropriate number of relevant custodians and key persons whose files are likely to contain
16 documents relating to the subject matter of this litigation (each a "Custodian") and a date by
17 which the parties will exchange such a list of Custodians. The parties agree that the list of
18 Custodians will include a description of the proposed Custodians' job title and brief description
19 of such person's responsibilities (including dates of employment by the applicable producing
20 party). The parties retain the right, upon reviewing the initial production of documents, and
21 conducting other investigation and discovery, to request that files from additional Custodians be
22 searched and to meet and confer regarding such request.
23

24 **B. ESI Sources**

25 The parties will meet and confer within 45 days of the entry of this Protocol regarding the
26 appropriate number of ESI storage systems or devices to search that may house potentially
relevant data, including both custodial and noncustodial sources of ESI (*e.g.*, shared drives,

1 network storage, local hard drives, etc.) (collectively, “ESI Sources”) and a date by which the
2 parties will exchange such a list of ESI Sources. The parties also will meet and confer regarding
3 sources of relevant ESI that may not be reasonably accessible as well as search methodology and
4 reach agreement on appropriate search terms and queries, file type and date restrictions before
5 any such effort is undertaken.
6

7 **C. Document Collection**

8 Following agreement on a list of Custodians and ESI Sources, each party will begin
9 collecting potentially responsive documents, ESI, and information in the possession, custody or
10 control of each Custodian and noncustodial source (the “Collected Documents”).
11

12 **D. Technologies**

13 Prior to use, the parties should meet and confer to disclose and discuss any proposed use
14 of technologies to reduce the number of documents to be reviewed or produced (*i.e.*, file type
15 culling, near de-duplication, email thread suppression or technology assisted review). Use of
16 these technologies to reduce the reviewable collection or production, other than as described
17 within this Protocol, requires the consent of the receiving party.
18

19 **E. Continuing Obligations**

20 The parties will continue to meet and confer regarding any search process issues as
21 necessary and appropriate, including agreeing to modify any of the dates and time frames set
22 forth in this Protocol. This Protocol does not address or resolve any other objection to the scope
23 of the parties’ respective discovery requests, and it does not prevent any party from undertaking
24 searches of its own ESI for its own purposes at any time.
25

26 **VI. PRESERVATION**

The parties acknowledge that they have an obligation to take reasonable steps to preserve
discoverable information in the party’s possession, custody, or control.

1 Unless otherwise provided in this Protocol, hard-copy and electronic records that may
2 contain non-duplicative information potentially relevant to the claims alleged in the Complaint,
3 or any defenses thereto, or that may be reasonably calculated to lead to the discovery of
4 admissible evidence, are subject to preservation.

5 The parties agree that they will meet and confer regarding the scope of preservation and
6 if the parties are unable to reach agreement, the parties may present the dispute for judicial
7 resolution.

8 The parties agree that the circumstances of this case do not currently warrant the
9 preservation, collection, review, or production of the following types of ESI, which tend not to
10 be reasonably accessible:

11 1. Deleted, shadowed, damaged, residual, slack, fragmented, or other data accessible
12 only by use of forensic software.

13 2. Random access memory ("RAM"), temporary files, or other ephemeral data that
14 are difficult to preserve without disabling the operating system.

15 3. On-line access data such as temporary Internet files, history, cache, cookies, and
16 the like.

17 4. Data stored on photocopiers, scanners, and fax machines that are not unique and
18 are duplicated in other accessible sources.

19 5. Overwritten data in metadata fields that are frequently updated automatically,
20 such as last-opened dates.

21 Responsive unique data not located on other accessible sources shall be preserved, and
22 identified as responsive inaccessible data pursuant to Federal Rule of Civil Procedure
23 26(b)(2)(B). Nothing herein shall prevent a party from subsequently requesting ESI, Documents,
24
25
26

1 or other data identified above be preserved pursuant to Federal Rule of Civil Procedure
2 26(b)(2)(B).

3 **VII. PREVIOUSLY PRODUCED MATERIAL**

4 To the extent a party produces in this Action any ESI, hard copy documents, structured
5 data, or other material previously produced by or to a party or third party other than in this
6 Action, including in response to governmental or regulatory inquiries or investigations or other
7 litigation, the party may produce the material in this Action in the same form as it was previously
8 produced, notwithstanding the terms of this Protocol, as long as that data was imaged or
9 produced in a reasonably usable form. Nothing in this paragraph affects the terms of any
10 protective or confidentiality order or agreement governing the production and use of such
11 previously produced data.
12

13 **VIII. PRIVILEGE AND REDACTION**

14 **A. Privilege and Redaction Logs**

15 Any party that withholds information (including by redaction) otherwise discoverable by
16 claiming that the information is privileged must produce a log in compliance with Federal Rule
17 of Civil Procedure 26(b)(5) and as set forth herein. Privileged or otherwise protected documents
18 dated after the filing of the first complaint in this Action do not need to be logged. Privilege logs
19 shall be exchanged within thirty (30) days after each document production.
20

21 **B. Redactions**

22 To the extent that any image file contains information subject to a claim of privilege or
23 any other applicable protection that requires redaction, the portion of the redacted text shall be
24 clearly identified on the face of the TIFF image, either by masking the redacted content with
25 electronic highlighting in black or through the use of redaction boxes. The label “Redacted for
26 [State Reason]” shall appear on the face of the redacted portion of the TIFF image (*e.g.*,

1 “Redacted for Privilege”). If providing the reason for the redaction is prohibited by applicable
2 law, the label “Redacted” shall appear on the face of the redacted portion of the TIFF image.
3 Unless otherwise agreed to and to the extent permitted by law, the producing party shall also
4 include information regarding the basis and justification for any redactions on its privilege log.

5 The redacted TIFF image shall be produced in accordance with the image load file
6 specifications in Table 1, and any other provisions for the production of TIFF images contained
7 herein. To the extent a document is redacted, OCR text files for such a document shall not
8 contain text for redacted portions. The original unredacted Native File shall be preserved
9 pending conclusion of the Action. To the extent any Native File contains information subject to
10 a claim of privilege or any other applicable protection that requires redactions, the producing
11 party shall either apply the redactions directly on the Native File itself or convert that file to
12 TIFF format and produce it with the necessary redactions.
13
14

15 **IX. OBJECTIONS PRESERVED**

16 Nothing in this Protocol shall be interpreted to require disclosure of relevant information
17 or data that is protected by the attorney-client privilege, work-product doctrine, or is prohibited
18 from disclosure under any similar law, regulation, rule, court order, or any other applicable
19 privilege or protection. The parties do not waive any objections to the production,
20 discoverability, or confidentiality of data or any other discovery materials, including, without
21 limitation, objections regarding the burden, overbreadth, cost-sharing, or relevance of document
22 requests related to data in a form specified in this Protocol. The parties also reserve the right to
23 seek, and the right to oppose, cost-sharing in connection with the collection and production of
24 data that is not reasonably accessible.
25

26 This Protocol is subject to the terms of the Stipulated Protective Order agreed between
the parties and entered by the Court and incorporates the terms thereof.

1 IT IS SO ORDERED.

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4 Dated this _____ day of _____, 2020.

5 Hon. James L. Robart
6 United States District Judge
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PRESENTED BY:

KELLER ROHRBACK L.L.P.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP.

By s/ Ryan McDevitt

Lynn Lincoln Sarko #16569
Gretchen Freeman Cappio #29576
Ryan McDevitt #43305
Maxwell Goins #54130
1201 Third Avenue, Suite 3200
Seattle, WA 98101-3052
(206) 623-1900
Fax (206) 623-3384
lsarko@kellerrohrback.com
gcappio@kellerrohrback.com
rmcdevitt@kellerrohrback.com
mgoins@kellerrohrback.com

Benjamin L. Bailey, *pro hac vice*
Jonathan D. Boggs, *pro hac vice*
BAILEY GLASSER LLP
209 Capitol Street
Charleston, WV 25301
(304) 345-6555
Fax (304) 342-1110
bbailey@baileyglasser.com
jboggs@baileyglasser.com

Attorneys for Plaintiffs

By s/ Gavin Snyder

Gavin Snyder #48332
Alicia Cobb #48685
600 University Street, Suite 2800
Seattle, WA 98101
1201 Third Avenue, Suite 3200
Seattle, WA 98101-3052
(206) 905-7000
Fax (206) 905-7100
aliciacobb@quinnemanuel.com
gavinsnyder@quinnemanuel.com

Shon Morgan, *pro hac vice forthcoming*
865 S Figueroa St., 10th Floor
Los Angeles, CA 90017
(213) 443-3000
Fax (213) 443-3100
shonmorgan@quinnemanuel.com

Attorneys for Defendants

TABLE 1


FIELDS AND METADATA TO BE PRODUCED

| <i>Field</i> | <i>Data Type</i> | <i>Hard Copy / Paper</i> | <i>Loose Native Files & Attachments</i> | <i>Email</i> |
|----------------------------|---|---|---|--|
| BegDoc | TEXT | Start Bates | Start Bates | Start Bates |
| EndDoc | TEXT | End Bates | End Bates | End Bates |
| BegAttach | TEXT | Starting bates number of document family | Starting bates number of document family | Starting bates number of document family |
| EndAttach | TEXT | Ending bates number of document family | Ending bates number of document family | Ending bates number of document family |
| Custodian | TEXT – single entry | Custodian of the document | Custodian of the document | Custodian of the document |
| ALL/Duplicate Custodian | Text – multi entry | Other custodians whose files contained a particular document that was eliminated through deduplication | Other custodians whose files contained a particular document that was eliminated through deduplication | Other custodians whose files contained a particular document that was eliminated through deduplication |
| File Path | TEXT | | File path where original file was collected from | Folder where email was collected from. Includes folder locations within email container files such as PST and NSF |
| From | TEXT | | | Sender of message |
| To | TEXT – separate entries with “;” | | | Recipients of message |
| CC | TEXT – separate entries with “;” | | | Copied recipients |
| BCC | TEXT – separate entries with “;” | | | Blind copied recipients |
| Subject | TEXT or MEMO if over 255 characters | | | Subject of message |

| <i>Field</i> | <i>Data Type</i> | <i>Hard Copy / Paper</i> | <i>Loose Native Files & Attachments</i> | <i>Email</i> |
|----------------|---|---|--|--|
| Date Sent | Date (mm-dd-yyyy) – e.g. 03-03-2012 | | | Date message sent |
| Time Sent | TEXT (hh:mm:ss) | | | Time message sent |
| Date Received | Date (mm-dd-yyyy) – e.g. 03-03-2012 | | | Date message received |
| Time Received | TEXT (hh:mm:ss) | | | Time message received |
| Document Type | TEXT | | Identifies document type as a loose e-file | Identifies document type as an email or attachment to an email |
| File Name | TEXT | | Name of original file | Name of original file |
| File Extension | Text | | Extension of original file | Extension of original file |
| File Size | Number | | File size in bytes | |
| Date Created | Date (mm-dd-yyyy) – e.g. 03-03-2012 | | Date file was created | |
| Date Modified | Date (mm-dd-yyyy) – e.g. 03-03-2012 | | Date file was last modified | |
| Title | TEXT or MEMO if over 255 characters | | Title from document metadata | |
| Author | TEXT | | Document author from metadata | |
| Company | TEXT | | Document company or organization from metadata | |
| Hash | TEXT | | MD5 Hash Value | MD5 Hash Value |
| Text File Link | TXT files should be named the same as the beg | Relative path to OCR or extracted text file | Relative path to OCR or extracted text file | Relative path to OCR or extracted text file |

| <i>Field</i> | <i>Data Type</i> | <i>Hard Copy / Paper</i> | <i>Loose Native Files & Attachments</i> | <i>Email</i> |
|------------------|--|---------------------------------|---|--|
| | doc and delivered in the same folder as the images or in a folder labeled Text (e.g., ABC0000001.txt) | | | |
| Native File Link | Should be named the same as the beg doc and delivered in the same folder as the images or in a folder labeled Natives (e.g., ABC0000001.xls) | | Relative path to native file as produced | Relative path to native file as produced |
| Redaction | TEXT | Redacted (yes) | Redacted (yes) | Redaction (yes) |
| Confidentiality | TEXT | Confidential Status of document | Confidential Status of document | Confidential Status of document |

DATED: March 17, 2020



JAMES L. ROBART
United States District Judge